

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
V.	)	NO. 1:09-CR-10017-GAO
	)	
TAREK MEHANNA	)	
_____	)	

DEFENDANT'S ASSENTED-TO MOTION TO CONTINUE HEARINGS

The defendant, Tarek Mehanna, moves that this court continue all court hearings and deadlines for a period of two months. As grounds therefore, the defendant states the following:

The defendant has received a large amount of discovery, including approximately 60 CDs and 15 cassette tapes of recordings of conversations among the defendant, a confidential informant, and others. These recordings are now being transcribed, but the transcriber informs defendant's counsel that it will take three to four weeks to complete transcription. In addition, the transcriber is now searching for a translation company to translate the Arabic contained on the recordings.

The defendant has recently been granted funds by the court for three experts and an investigator. As these experts are in academia and are engaged in summer projects, they are unable to begin work on this case immediately. When they do, they will be required to review a substantial amount of material. As funds

for an investigator were only recently granted, the investigator has yet to begin work.

Counsel for the defendant was on vacation during most of the month of August.

Due to the large amount of discovery, the need for time for the experts and the investigator to complete their work, and the defendant's counsel's schedule, the defendant will not be able to adequately prepare for court hearings and deadlines as scheduled. Continuing these dates for a period of two months will give counsel time to prepare.

Counsel for the defendant has spoken with AUSA Aloke Chakravarty, who assents to this motion.

The defendant hereby waives the Speedy Trial Act.

WHEREFORE, the defendant requests that this court continue all court hearings and deadlines for a period of two months.

Tarek Mehanna  
By His Attorneys

CARNEY & BASSIL

/s/ J. W. Carney, Jr.

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Dated: September 3, 2009

Certificate of Service

I hereby certify that the above document has been served on all parties of record by mail, fax, electronic means, or in hand on or before the above date.

/s/ J. W. Carney, Jr.  
J. W. Carney, Jr.